

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DISTRICT

OLIVIA Y, by and through her next friend, James D. Johnson;  
JAMISON J, by and through his next friend, Clara Lewis;  
JOHN A, by and through his next friend, James D. Johnson;  
CODY B, by and through his next friend, Sharon Scott; and  
MARY, TOM, MATTHEW and DANA W, by and through  
their next friend Zelatra W, and on their behalf and behalf of  
all others similarly situated

PLAINTIFFS

vs.

CIVIL ACTION NO. 3:04cv251-TSL-FKB

PHIL BRYANT, as Governor of the State of Mississippi;  
JESS H. DICKINSON, as Commissioner of Mississippi Department  
of Child Protection Services; and TRACY MALONE, as Deputy  
Commissioner of Child Welfare, Mississippi Department of  
Child Protection Services

DEFENDANTS

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**PARTIES' UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO  
PLAINTIFFS' MOTION FOR CONTEMPT, FOR AN EVIDENTIARY HEARING, AND  
FOR THE APPOINTMENT OF A RECEIVER**

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COME NOW Defendants, pursuant to Fed. R. Civ. P. 6(b)(1), and move this Court for an extension of time, from June 14, 2018 to July 3, 2018, to respond to Plaintiffs' Motion for Contempt, for an Evidentiary Hearing, and for the Appointment of a Receiver [Docs. No. 739, 741]. As grounds for this Motion, Parties state:

1. Additional time is required in order to be responsive to the issues Plaintiffs have raised in their motion and to prepare an appropriate legal response.

2. Counsel for Plaintiffs has advised undersigned counsel that Plaintiffs have no objection to the requested extension. And, in light of Defendants' request for an extension of time to file their response, Plaintiffs request the deadline to file their reply in further support of

their Motion for Contempt, for an Evidentiary Hearing, and for Appointment of a Receiver be extended to July 20, 2018. Defendants also have no objection to Plaintiffs' request.

3. The extension of time sought is made in good faith and not requested solely for purposes of undue delay.

WHEREFORE, PREMISES CONSIDERED, Defendants respectfully request that the Court enter an Order granting Defendants an extension of time until July 3, 2018, to file their response to Plaintiffs' Motion for Contempt, for an Evidentiary Hearing, and for the Appointment of a Receiver, and also granting Plaintiffs an extension of time until July 20, 2018, to file their reply in further support of their Motion for Contempt and for the Appointment of a Receiver.

Respectfully submitted, this the 8th day of June, 2018,

PHIL BRYANT, as Governor of the State of Mississippi;  
JESS H. DICKINSON, as Commissioner of Mississippi  
Department of Child Protection Services; and TRACY  
MALONE, as Deputy Commissioner of Child Welfare,  
Mississippi Department of Child Protection Services

By: /s/ Kenya Key Rachal (MSB #99227)

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**CERTIFICATE OF SERVICE**

I, Kenya Key Rachal, do hereby certify that on June 8, 2018, I electronically filed a true and correct copy of the foregoing document with the Clerk of Court using the ECF system which sent notification of such to counsel as follows:

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SO CERTIFIED, this 8<sup>th</sup> day of June, 2018.

/s/ Kenya Key Rachal.